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February 13, 2025

BY ECF:

The Honorable Stewart D. Aaron
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

RE: United States v. Jose Aburto
Case No.: 1:24-mj-01076-1
Southern District of New York
Third Letter Motion Seeking Temporary Modification of Conditions of Release

Dear Magistrate Judge Aaron:

Please be advised that I represent **Jose Aburto** in the above-captioned action.

Mr. Aburto is currently subject to release conditions as per the March 14, 2024 Appearance Bond (See ECF No. 3). Pursuant to his Bond, Mr. Aburto's travel is currently restricted to the Southern and Eastern Districts of New York, and he surrendered his travel documents.

We respectfully request two temporary modifications of Mr. Aburto's release conditions. Mr. Aburto seeks permission from the court for the temporary return of his passport and travel to Paris, France, for a work event. This is his third request for a temporary modification.

Mr. Aburto is a grand vendeur for Christian Dior. He was selected to host the company's VIP clients at the Dior Women's Autumn-Winter 2025 fashion show in Paris. This assignment requires him to travel from March 1, 2025, to March 7, 2025.

All other restrictions on Mr. Aburto will remain in place throughout his trip, and the temporary modifications will terminate on March 8, 2025.

I have also spoken with PTSO Taelor Nisbeth regarding this request. Her office has agreed to release Mr. Aburto's passport subject to Your Honor's approval of this request. PTSO Nisbeth and PTS have no position regarding the requested temporary modifications. AUSA Adam S. Sowlati and the Government do not object.

Thank you in advance for your time and consideration in this matter.

The Honorable Stewart D. Aaron
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Sincerely,
Spodek Law Group P.C.
/s/ Todd A. Spodek
Todd A. Spodek

cc: All Counsel of Record (By ECF).
PTSO Taelor Nisbeth (By Email).

Request GRANTED. SO ORDERED.
Dated: 2/14/2025

A handwritten signature in blue ink, appearing to read "Stewart D. Aaron", is written over the typed name.